

Claim 1 and its dependents are allowable over the Examiner's combination at least because even if it were proper to combine the references as suggested by the Examiner, the combination would still fail to teach or suggest each and every element as claimed. For example, claim 1 recites "compressing the connecting member radially inwardly so as to caulk an inserted portion of the electric wire uniformly over a whole periphery thereof ..." Compressing the connecting member *so as to caulk an inserted portion of the electric wire* is clearly claimed and cannot be ignored by the Examiner. Swengel clearly lacks this feature of claim 1.

The Examiner asserts that Swengel column 2, lines 64-66 teaches compressing as claimed (*see* the Response to Arguments section on page 4 of the outstanding Office Action). However, this section of Swengel clearly does not teach the claimed compressing. Instead, this portion of Swengel teaches only forging or crimping sleeves 22 and 24 (sleeve 24 being the alleged connecting member) to mechanically lock them. There is nothing which teaches compressing a connecting member so as to caulk an inserted portion of the electric wire. The crimping or forging cited by the Examiner is unrelated to the alleged wire (electrical lead 10). Since the alleged Swengel compressing is unrelated to the alleged wire, it cannot be considered as compressing so as to caulk an inserted portion of an electric wire as claimed.

Furthermore, the portion of Swengel cited by the Examiner (column 2, lines 64-66) relates to the assembly of the terminal 16. The sleeves 22, 24 are crimped or forged before the alleged wire is even inserted into the terminal (*see* Fig. 4). Therefore, when the alleged Swengel compressing occurs, there is not even an inserted portion of a wire. Clearly the Swengel crimping or forging cannot constitute the claimed compressing when it is done before there is even an inserted wire.

In view of the above, Swengel clearly fails to teach compressing as set forth in claim 1. The APA fails to correct this deficiency of Swengel. Therefore, claim 1 is allowable over the Examiner's combination of Swengel and the APA.

Claims 2-3 depend from claim 1 and Applicants submit that they are therefore allowable at least because of their dependency. Additionally, claim 2 recites rotary swaging. The Examiner asserts that the combination of Swengel and the APA disclose compressing by rotary swaging as claimed, but fails to indicate where such a feature is allegedly taught. In fact, it appears as though neither Swengel nor Prior Art Figs. 7 and 8 of the present application teach anything regarding rotary swaging at all. Accordingly, claim 2 is further allowable at least because the Examiner's combination fails to teach rotary swaging as claimed.

Claim 4

Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Swengel in view of the APA and further in view of Newman et al. Applicants respectfully traverse this rejection.

Claim 4 depends from claim 1. The Examiner uses Newman only for the feature of a clamping portion. Newman fails to correct the above-noted deficiencies of the combination of Swengel and the APA. Therefore, even if, for the sake of argument alone, the Examiner's assertions regarding Newman were correct, and one of ordinary skill in the art would have been motivated to modify Swengel and the APA with Newman, the combination would still be deficient with respect to claim 1 and its dependents. Accordingly, Applicants submit that claim 4 is allowable over the combination of Swengel, the APA and Newman.